# **EXHIBIT 4**

# **Case Administration**



EIN: 36-2757501

Velsicol Restructuring c/o Tim Horn 10400 W Higgins Rd, Ste 303 Rosemont, IL 60018 Invoice Number: \*\*\*\*\*

Invoice Date: 08/28/2024

Billing Attorney: Steven P. Blonder

Matter Number: 0020382.0011

# 23 - Case Administration

# FEES THROUGH APRIL 30, 2024

Date	Atty.	Description	Hours
09/21/23	JMS	Review and revise first day emergency motion and exhibits (1.4); file emergency motion (.2); call with G Silver re: same (.2). discussion with J Friedland re: motion for emergency hearing (.2).	2.00
09/21/23	JMS	Discussion with J Friedland re: US Trustee concerns with first day motions(.2), call with US Trustee's office re: first day motions (.7); follow up with J Friedland re: modifications with motions (.2); discussion with T Horn re: US Trustee concerns (.4).	1.50
09/21/23	RWG	Confer with A. Hernandez re filing issues (.5) review and revise petition amendment (.6) attend to filing issues and amendment to petition (2.1) call with J. Schwartz re filing issues (.2)	3.40
09/21/23	RWG	Review rules regarding emergency filing (.3) memo to J. Schwartz re emergency filing issues (.2)	0.50
09/21/23	JPF	Video conference with UST and J. Schwartz re first day motions (1.0); telephone conference with Tim Horn re UST conversation and final revisions to pleadings (.5); telephone conference with Courtroom Deputy (.2); draft email re emergency motion, and motion to shorten notice (.4).	2.10
09/22/23	JMS	Review Judge's order setting emergency motion and follow up to set motion	0.10
09/22/23	JMS	Review and finalize motion and order to pay wages along with certificate of service (.5) and attention to filing (.1)	0.60
09/22/23	JMS	Finalize Foreign/Lien motion and order for filing	0.50
09/22/23	JMS	Finalize cash management motion, order and exhibits for filing	0.40

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Payment due within 30 days of invoice Questions?
Email:billinginquiries@muchlaw.com

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Date	Atty.	Description	Hours
09/22/23	JMS	Finalize joint administration motion and order (.2) and file in all 3 cases (.2).	0.40
09/22/23	JMS	Discussions with T Feil from BMC regarding certificates of service for first day motions (.3) and review same (.2)	0.50
09/22/23	JMS	Numerous discussion with T Horn re: 341 meeting, first day motions and next steps in case.	0.70
09/22/23	JMS	Strategy conference with R Glantz and J Friedland re: next steps and open issues	0.40
09/22/23	JMS	Discussion with J Friedland re US trustee comments and open issues on first day motions	0.30
09/22/23	JPF	Attention to UST comments to initial first day pleadings (.4); attention to service issues (.8); telephone conference with M. Brash and J. Schwartz (.2).	1.40
09/24/23	JPF	Telephone call with J. Schwartz re upcoming deadlines and next steps.	0.50
09/25/23	SPB	Confer with J. Schwartz regarding first day hearing and T. Horn preparation for same.	0.30
09/25/23	JMS	Discussion with S Blonder re: first day motion and need to prepare T Horn for hearing	0.30
09/25/23	JMS	Discussions with T Horn re: issues raised by the US trustee on wages motion and other questions for first day hearing.	0.60
09/26/23	SPB	Telephone conference with T. Horn and J. Schwartz to prepare for hearing.	0.70
09/26/23	JMS	Email T Horn and S Blonder to prepare for hearing	0.70

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#### 23 - Case Administration

Date	Atty.	Description	Hours
09/26/23	JMS	Draft response email to G Silver regarding US Trustee's remaining issues with first day pleadings (.6); review and revise orders to make changes to resolve issues raised by US Trustee including joint admin order, cash management order, wages order and foreign/lien vendor order; (1.4); call with G Silver and M Brash regarding redlines and open issues (.4); numerous follow up discussions and emails with T Horn regarding additional information and changes to first day orders (.7); discussions with J Friedland re open issues with orders and language to resolve disputes (.3)	3.40
09/26/23	JMS	Prepare outline for first day hearing	1.30
09/27/23	SPB	Appear in court regarding first day motions (2.1); met with T. Horn and J. Schwartz to prepare for hearing (.7).	2.80
09/27/23	JMS	Prepare orders for hearing (.4); prepare for first day motions (.9); meet with T Horn and S Blonder to prepare for hearing (.7); attend hearing on first day motions (2.1); revise cash management order and circulate for comment (.2) call and emails with bank counsel regarding additional language to add to cash management order (.2)	4.50
09/27/23	JMS	Strategy meeting with J Friedman and R Glantz re: additional motions to file and next steps	0.60
09/29/23	CG	Update comparison of creditor matrix lists.	1.60
10/02/23	JMS	Review draft notice of commencement of case (.1); and comment on same (.1).	0.20
10/02/23	JPF	Review and comment on notice of commencement of cases.	0.20
10/03/23	JMS	Review and revise motion to extend time to file schedules (.4) draft proposed order (.2); finalize motion for filing (.2).	0.80

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#### 23 - Case Administration

Date	Atty.	Description	Hours
10/03/23	JPF	Telephone call with T. Horn regarding various open issues.	0.20
10/03/23	JPF	Draft motion to extend time to file schedules and SOFAs	1.30
10/03/23	JPF	Video conference with Client to review follow-up questions from first days and initial debtors' interview.	1.50
10/04/23	JMS	Revise utility motion and necessary addresses	0.70
10/04/23	JMS	Review documents regarding letter of credit account at Bank of America (6); numerous discussion with T Horn re: same (.3)	0.90
10/04/23	JPF	Video conference with Client to review follow-up questions from first days and initial debtors' interview.	1.50
10/05/23	JMS	Finalize utility motion.	0.50
10/09/23	JMS	Review and revise critical dates memo	0.30
10/09/23	JPF	Draft critical dates memo.	0.60
10/10/23	JMS	Draft cash management order and final foreign lien vendor order (.4) and emails to M Brash and G Silver re: same (.1).	0.50
10/11/23	JMS	Prepare for (.3) and attend hearings in Velsicol (.9).	1.20
10/11/23	JMS	Revise proposed orders for filing on extension of time to file schedules, foreign vendor and cash management.	0.30
10/12/23	JMS	Discussion with Judge's clerk regarding order to extend schedules	0.10
10/17/23	JMS	Follow up with T Horn re: cash management and meeting with Subchapter V trustee	0.10
10/17/23	RWG	Call with clerk re creditor list issues	0.20

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Date	Atty.	Description	Hours
10/18/23	JMS	Prepare for (.2) and attend hearing on utility motion (.5).	0.70
10/18/23	JMS	Prepare notice to be sent to utility companies pursuant to order	0.10
10/24/23	JMS	Prepare for call with US Trustee office and G Silver regarding putting money into certificated of deposit (.3); follow up with T Horn re: same (.1); revised cash management order to extend time to move account (.2) email to G Silver re: same (.1).	0.70
10/24/23	JMS	Review order setting Subchapter V status conference (.1) and emails with BMC regarding service of order (.1).	0.20
10/25/23	JMS	Attend hearing on B. Riley Application and continued cash management motion	1.40
10/25/23	JMS	Review BMC monthly invoice	0.30
10/26/23	JMS	Discussion with J Pegnia Re; US Trustee issues with creditor's matrix.	0.20
10/28/23	JMS	Review spreadsheet and emails to L Clemente on creditor's matrix (.2); discussion with T Horn re: same (.1)	0.30
10/31/23	JMS	Call with T Horn re: open issues	0.20
11/02/23	SPB	Telephone conference with J. Schwartz regarding call with M. Brash.	0.20
11/02/23	JMS	Draft initial outline for Sub Chapter V plan status report.	0.80
11/02/23	JMS	Email to T Feil at BMC regarding need to coordinate service later this month on Subchapter V status report going to all creditors	0.10
11/02/23	JMS	Discussion with J Friedland re; meeting with M Brash	0.10

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# 23 - Case Administration

Date	Atty.	Description	Hours
11/06/23	JMS	Emails to T Horn re: meeting with SubChapter V trustee (.1), call with M Brash re continued meeting and open issues and questions (.1); discussion with T Horn re: questions from SubChapter V trustee; (.2).	0.40
11/06/23	JMS	Call with T Horn re: outstanding invoices and bills	0.20
11/06/23	JMS	Draft Subchapter V status report.	1.20
11/07/23	SPB	Review and comment regarding draft status report.	0.20
11/07/23	JMS	Continue drafting Subchapter V status report (1.1); email to T Horn and J Pegnia re: same (.1)	1.20
11/08/23	JMS	Finalize Chapter 11 status report (.9); coordinate with BMC regarding service of SubChapter V status report on all creditors (.2)	1.10
11/09/23	JMS	Discussions with T Horn on weekly update meeting	0.90
11/10/23	JMS	Review certificate of service filed by BMC group regarding Subchapter v Status report	0.10
11/13/23	SPB	Telephone conference with J. Schwartz following Sub-5 trustee meeting regarding status and strategy.	0.20
11/13/23	JMS	Call with T Horn re: various open items	0.10
11/13/23	JMS	Discussion with T Horn re: trustee's concluding 341 meeting in Velsicol Chemical case	0.10
11/15/23	JMS	Attend hearing on cash management motion	0.80
11/16/23	JMS	Weekly check in call with T Horn to review open issues and follow up call	0.90
11/16/23	JMS	Review and revise final cash management order (.3); emails with G Silver final cash management order (.2)	0.50

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Date	Atty.	Description	Hours
11/21/23	SPB	Review and comment regarding materials for hearing on Subchapter V status.	0.20
11/21/23	JMS	Prepare for Subchapter v status hearing including reviewing most recent financial information (1.3) and discussion with T Horn re: same (.2); numerous discussions with S Blonder regarding issues for status (.2)	1.70
11/21/23	JMS	Finalize and file cash management order	0.10
11/22/23	SPB	Telephone conference with J. Schwartz regarding status and strategy post-court hearing.	0.20
11/22/23	JMS	Prepare for (.3) and attend Subchapter V status hearing and final hearing on cash management (1.1); discussion after hearing with Travelers counsel (.2) call with T Horn in preparation of hearing (.2)	1.70
11/22/23	JMS	Call with T Horn on weekly status and open issues	0.50
12/04/23	JMS	Weekly status meeting with T Horn regarding open issues	0.70
12/07/23	JMS	Status call with T Horn on open issues	1.00
12/20/23	SPB	Attend court hearing on 2004 motion (.9); telephone call with J. Schwartz regarding same (.1).	1.00
12/20/23	JMS	Attend hearing on District's 2004 motion (.9); follow up call with S Blonder (.1);	1.00
01/02/24	JMS	Discussion with J Pegnia on status and next steps	0.30
01/03/24	SPB	Appear in court regarding 2004 issue.	0.90
01/03/24	JMS	Prepare for hearing on rule 2004 motion (1.5) and attend hearing in Velsciol (.9)	2.40

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Date	Atty.	Description	Hours
01/09/24	JMS	Draft motion to exceed page limit for objection (.6) and file (.1)	0.70
01/11/24	HJ	Strategy conference with Jeff Schwartz re: plan procedures motion and special advisors' retention motions	0.50
01/17/24	SPB	Multiple telephone conferences with T. Horn regarding today's hearing	0.70
01/17/24	JMS	Attend hearing in Velsciol on motion to extend time to assume or reject lease, 2004 objection and motion to exceed page limit	2.30
01/18/24	SPB	Telephone conference with T. Horn regarding status and strategy.	0.50
01/18/24	JMS	Discussion with J Friedland and R Glantz on strategy and next steps	0.80
01/18/24	RWG	Call with J. Schwartz and J. Friedand re case status, plan objection issues and claim strategy	0.80
01/19/24	SPB	Telephone conference with T. Horn re: case issues	0.40
01/23/24	JMS	Begin work on plan solicitation motion and analyze timing (1.5); call with BMC to discuss procedures for distributions, timing and cost (.5)	2.00
01/25/24	SPB	Telephone conference with T. Horn and J. Schwartz regarding financial issues.	1.00
01/25/24	JMS	Discussion with J Friedland re strategy going forward	0.10
01/25/24	JMS	Follow up call with T Horn and S Blonder on case strategy.	0.30
01/25/24	JPF	Phone call with J. Schwartz re case strategy.	0.10
01/29/24	JMS	Respond to G Silver email re: next steps in case	0.10
01/29/24	JMS	Discussion with T. Horn re: case administration issue	0.40
01/29/24	JMS	Review proofs of claim filed in case (1.2) and prepare chart re: same (.6)	1.80

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Date	Atty.	Description	Hours
01/30/24	SPB	Discussion with J. Sarasin regarding 2004 issues and upcoming court hearing.	0.30
01/30/24	JAS	Discussion with S. Blonder and J. Schwartz regardings 2004 issues (.2) review issues re: same (.2)	0.40
01/30/24	JMS	Call with T Horn re; hiring certain professionals	0.20
01/30/24	JMS	Strategy discussion with S. Blonder re: plan timing.	0.40
01/30/24	JMS	Emails and discussions with T. Horn in preparation for Subchapter V status hearing	0.50
01/30/24	JMS	Prepare update for subchapter v case status hearing	0.70
01/31/24	JMS	Prepare for (.4) and attend Subchapter V status conference (1.8)	2.20
01/31/24	JMS	Respond to email from G Silver re: upcoming status hearing.	0.10
01/31/24	JMS	Numerous email to T Horn re: status hearing and next steps	0.30
02/02/24	JMS	Follow up with T. Marshal at BMC re timing of pleadings in case	0.20
02/02/24	JMS	Call with T. Horn re: open issues	0.10
02/08/24	SPB	Meet with T. Horn and J. Schwartz regarding business operations and other case issues	3.30
02/08/24	JMS	Meeting with T Horn and S Blonder on open issues in case including business issues	3.30
02/16/24	JMS	Call with T. Horn re: open business issues	0.10
02/16/24	RWG	Call with T. Horn re motion to hire ordinary course professionals and special counsel	0.60

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Date	Atty.	Description	Hours
02/22/24	SPB	Telephone conference with T. Horn on case issues.	0.60
02/23/24	JMS	Analyze next steps in case and timing related issues in light of 2004 ruling.	0.90
02/26/24	SPB	Telephone conference with J. Schwartz regarding case strategy.	0.60
02/26/24	JMS	Email to G. Silver and M Brash re: 2004 ruling (.1)	0.10
02/29/24	JMS	Decisions with T. Horn re case strategy and nest steps	0.50
03/04/24	JMS	Follow up on state court personal injury lawsuit and contempt issues.	0.30
03/11/24	JMS	Updates with T Horn on case status and next steps.	0.20
03/13/24	SPB	Meet with T. Horn and J. Schwartz regarding case issues, plan issues, DC.	2.20
03/13/24	JMS	Meeting with T Horn and S Blonder re: plan issues, EPA issue and DC issues	2.20
03/27/24	JMS	Call with J Pegina re update on status	0.20
03/28/24	JMS	Call to M Brash on status	0.10
04/01/24	JMS	Meet with S Blonder re; subchapter v status hearing	0.40
04/02/24	JMS	Discussion with T Horn regarding status conference and report to court	0.20
04/02/24	JMS	Discussion with M Brash re: case	0.20
04/02/24	JMS	Prepare subchapter v status hearing outline	0.50
04/03/24	JMS	Respond to G Silver email re: insurance renewal	0.10
04/03/24	JMS	Prepare for (.3) and attend SubChapter V status hearing before Judge Cleary (.8)	1.10
04/03/24	JMS	Follow up with T Horn re: status hearing	0.10

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Date	Atty.	Description	Hours
04/08/24	JMS	Call with T. Horn re: weekly case update	0.30
04/19/24	JMS	Email to M Brash re update on case and DC 2004 exam	0.10
04/23/24	JMS	Communications with T Horn re: renewal of general insurance	0.20
04/25/24	JMS	Attend meeting with T Horn and S Blonder on case issues and next steps	0.60
		Total Hours	105.00
Total			72,883.50

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# TIMEKEEPER SUMMARY THROUGH APRIL 30, 2024

Timekeeper	Rate	Hours
Blonder, Steven P.	\$720.00	5.80
Blonder, Steven P.	\$755.00	10.50
Friedland, Jonathan P.	\$720.00	0.10
Friedland, Jonathan P.	\$685.00	9.30
Glantz, Robert W.	\$670.00	4.10
Glantz, Robert W.	\$705.00	1.40
Grabowski, Cecelia	\$205.00	1.60
Jouglaf, Hajar	\$430.00	0.50
Sarasin, Joanne A.	\$635.00	0.40
Schwartz, Jeffrey M.	\$685.00	43.70
Schwartz, Jeffrey M.	\$720.00	27.60
Total Hours		105.00

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# **EXPENSE SUMMARY THROUGH APRIL 30, 2024**

Description	Amount
Transportation	\$23.33
Total	\$23.33

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